

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

JOSEPH HAEN, on behalf of himself and all others similarly situated,

C.A. No. 4:09-cv-501

Plaintiff,

v.

IAWA TELECOMMUNICATIONS SERVICES, INC.; ALAN L. WELLS; KENNETH R. COLE; NORMAN C. FROST; BRIAN G. HART; H. LYNN HORAK; CRAIG A. LANG; KENDRIK E. PACKER; and WINDSTREAM CORPORATION,

Defendants.

SANJAY ISRANI, individually, and on behalf of all others similarly situated,

C.A. No. 4:09-cv-514

Plaintiff,

v.

ALAN L. WELLS, KENNETH R. COLE, NORMAN C. FROST, BRIAN G. HART, H. LYNN HORAK, CRAIG A. LANG, KENDRIK E. PACKER, IOWA TELECOMMUNICATIONS SERVICES, INC., and WINDSTREAM CORPORATION,

Defendants

**DECLARATION OF DONALD J. ENRIGHT IN SUPPORT OF
PLAINTIFFS' MOTION TO CONSOLIDATE RELATED ACTIONS
AND APPOINT LEAD COUNSEL**

I, DONALD J. ENRIGHT, hereby declare that the following is true and correct to the best of my knowledge, information and belief:

1. I am a member in good standing of the District of Columbia Bar and a partner at the law firm Finkelstein Thompson LLP, counsel for Plaintiff Joseph Haen

("Plaintiff"). My application for admission *pro hac vice* has been filed with the Court.

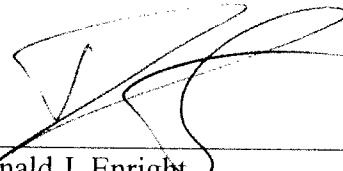
2. Attached hereto as Exhibit A is a true and correct copy of the firm resume of the law firm Finkelstein Thompson LLP.

3. Attached hereto as Exhibit B is a true and correct copy of the firm resume of the law firm Wolf Haldenstein Adler Freeman & Herz LLP.

4. Attached hereto as Exhibit C is a true and correct copy of the firm resume of the law firm Wandro & Baer.

5. Although counsel for defendants have not made an appearance yet in this litigation, Counsel for Plaintiffs conferred with Michael Reck of Belin McCormick, counsel for Defendant Iowa Telecommunications Services, Inc., and Robert Saunders with Skadden Arps, counsel for Defendant Windstream Corporation. While Mr. Saunders did not immediately have a position on the motion, Mr. Reck stated that his clients would not oppose the motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of December 2009, at Washington, D.C.



Donald J. Enright